

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen Williams  
Magistrate Judge

Honorable Thomas Vanaskie  
(Ret.),  
Special Discovery Master

**STATEMENT OF NO BRIEF PURSUANT LOCAL RULE 7.1(d)(4)**

Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Huahai U.S. Inc. (“Huahai U.S.”), and Solco Healthcare U.S. LLC (“Solco”, and collectively with ZHP and Princeton, “the ZHP Parties”), by and through their undersigned counsel, Duane Morris LLP, hereby submit, pursuant to Local Civil Rule 7.1(d)(4), that no brief in support of their Motion to Redact and Seal A Portion of Plaintiffs’ Brief in Opposition to the ZHP Parties’ Motion for a Protective Order Precluding the Deposition of Baohua Chen, and Exhibit KK, is necessary for the reasons set forth in Local Rule 5.3(c)(1), governing motions to seal.

Respectfully submitted,

DUANE MORRIS LLP

*/s/ Kelly A. Bonner*

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Dated: August 5, 2021